

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA :
 :
v. : 1:21CR 37 -1
 :
ANDREA MARIE PASLEY :

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment:

1. ANDREA MARIE PASLEY was a resident of Durham County, North Carolina, within the Middle District of North Carolina.
2. Karen Marie Jones and Audrey Renetta Odom were residents of Durham County, North Carolina, within the Middle District of North Carolina.
3. Karen Marie Jones owned Jones and Stone Taxes, a tax preparation business located in Durham, North Carolina, within the Middle District of North Carolina, that she formed in December 2012.
4. Beginning on or about December 1, 2012, and continuing until on or about April 15, 2017, the exact dates to the Grand Jurors unknown, ANDREA MARIE PASLEY worked at Jones and Stone Taxes as a tax return preparer, with others including Karen Marie Jones and Audrey Renetta Odom.

5. The Internal Revenue Service (“IRS”) was an agency of the United States Department of the Treasury responsible for enforcing and administering the tax laws, and collecting taxes owed to the United States.

COUNT ONE
(Conspiracy to Defraud the United States)

6. Beginning on or about December 1, 2012, and continuing until on or about April 15, 2017, the exact dates to the Grand Jurors unknown, in the Middle District of North Carolina, and elsewhere, ANDREA MARIE PASLEY, Karen Marie Jones, Audrey Renetta Odom, and others known and unknown to the Grand Jurors, did voluntarily and knowingly combine, conspire, confederate, and agree together and with each other to defraud the United States for the purpose of impeding, impairing, obstructing, and defeating the lawful government functions of the IRS in the ascertainment, computation, assessment, and collection of federal income taxes, in violation of Title 18, United States Code, Section 371.

MANNER AND MEANS

Among the manner and means by which ANDREA MARIE PASLEY, and others known and unknown to the Grand Jurors, carried out the conspiracy were the following:

7. ANDREA MARIE PASLEY, Karen Marie Jones, Audrey Renetta Odom, and others known and unknown to the Grand Jurors, aided and assisted in the preparation and filing of false U.S. Individual Income Tax Returns (IRS Forms 1040, 1040A, and 1040EZ) that resulted in issuance by the IRS of refunds to which the clients were not entitled. The false items on the returns included, but were not limited to, false education credits, false dependents, false business income, and false federal withholdings.

8. ANDREA MARIE PASLEY, Karen Marie Jones, and Audrey Renetta Odom, and others known and unknown to the Grand Jurors, aided and assisted in the preparation and filing, and caused the preparation and filing of, their own false U.S. Individual Income Tax Returns (IRS Forms 1040, 1040A, and 1040EZ) that resulted in issuance by the IRS of refunds to which they were not entitled. False items on the returns included, but were not limited to, false education credits and false dependents.

9. ANDREA MARIE PASLEY, Karen Marie Jones, and Audrey Renetta Odom, and others known and unknown to the Grand Jurors, charged clients fees ranging from approximately \$375 to \$3,000 for preparing their tax returns. On some occasions, the co-conspirators would make arrangements to meet the client at a check cashing business, where the co-conspirator would

then require the client to cash the check and provide the co-conspirator with a portion of the cash.

OVERT ACTS

In furtherance of the conspiracy, and to affect the objects thereof, members of the conspiracy and others known and unknown to the Grand Jurors, committed and caused to be committed the overt acts below, among others, within the Middle District of North Carolina, and elsewhere:

10. On or about the dates listed below, ANDREA MARIE PASLEY, Karen Marie Jones, Audrey Renetta Odom, and others known and unknown to the Grand Jurors, prepared and filed, and caused the preparation and filing of, false United States Individual Income Tax Returns (IRS Forms 1040, 1040A, and 1040EZ) for the tax years and the individuals with initials identified below, each return constituting a separate overt act:

Overt Act	Approximate Date Filed	Name	Form Type	Tax Year	False Entries
10-A	Jan. 27, 2014	D.S.	1040A	2013	Wages (line 7) American Opportunity Credit (line 40)
10-B	Jan. 22, 2015	D.S.	1040	2014	Other Income (line 21) American Opportunity Credit (line 68)
10-C	Feb. 1, 2016	D.S.	1040A	2015	Wages (line 7)

					American Opportunity Credit (line 44)
10-D	Feb. 12, 2017	D.S.	1040EZ	2016	Federal Withholdings (line 7)
10-E	Feb. 24, 2013	C.P.	1040	2012	Education Credits (line 49) American Opportunity Credit (line 66)
10-F	Feb. 17, 2014	C.P.	1040A	2013	Education Credits (line 31) American Opportunity Credit (line 40)
10-G	Feb. 8, 2015	C.P.	1040A	2014	Education Credits (line 33) American Opportunity Credit (line 44) Federal Withholdings (line 40)
10-H	Feb. 18, 2016	C.P.	1040A	2015	Education Credits (line 33) American Opportunity Credit (line 44) Federal Withholdings (line 40)
10-I	Feb. 12, 2017	C.P.	1040A	2016	Federal Withholdings (line 40)
10-J	Feb. 6, 2014	C.L.	1040A	2013	Wages (line 7) American Opportunity Credit (line 40)
10-K	Feb. 14, 2015	C.L.	1040A	2014	Wages (line 7) American Opportunity Credit (line 44)
10-L	Feb. 3, 2016	C.L.	1040A	2015	Wages (line 7) American Opportunity Credit (line 44)

10-M	Feb. 14, 2014	B.E.	1040A	2013	Education Credits (line 31) American Opportunity Credits (line 40)
10-N	Feb. 3, 2015	B.E.	1040A	2014	Education Credits (line 33) American Opportunity Credit (line 44) Federal Withholdings (line 40)
10-O	Feb. 1, 2014	A.E.	1040A	2013	American Opportunity Credit (line 40)
10-P	Feb. 4, 2015	A.E.	1040A	2014	American Opportunity Credit (line 44) Dependents (lines 1-4)
10-Q	Feb. 6, 2016	A.E.	1040A	2015	Education Credits (line 33) American Opportunity Credit (line 44) Dependents (lines 1-4)
10-R	Feb. 7, 2014	M.B.	1040A	2013	Education Credits (line 31) American Opportunity Credit (line 40)
10-S	Feb. 3, 2015	M.B.	1040A	2014	Education Credits (line 33) American Opportunity Credit (line 44)
10-T	April 2, 2016	M.B.	1040A	2015	Education Credits (line 33) American Opportunity Credit (line 44)
10-U	Jan. 29, 2016	R.L.	1040A	2015	Wages (line 7) American Opportunity Credit (line 44)

10-V	Jan. 20, 2015	G.T.	1040A	2014	Education Credits (line 33) American Opportunity Credit (line 44)
10-W	Feb. 2, 2016	G.T.	1040A	2015	Education Credits (line 33) American Opportunity Credit (line 44)
10-X	March 28, 2015	J. I.	1040A	2014	Education Credits (line 33) American Opportunity Credit (line 44)
10-Y	March 8, 2016	J. I.	1040	2015	Education Credits (line 50) American Opportunity Credit (line 68)
10-Z	Feb. 13, 2015	Y.W.	1040A	2014	Federal Withholdings (line 40) American Opportunity Credit (line 44)
10-AA	Feb. 5, 2016	Y.W.	1040A	2015	Wages (line 7) American Opportunity Credit (line 44)

11. ANDREA MARIE PASLEY charged G.T. \$3,000 to prepare the 2014 return described in 10-V, above. G.T. made this payment on or about February 19, 2015.

12. ANDREA MARIE PASLEY charged G.T. \$3,000 to prepare the 2015 return described in 10-W, above. G.T. made this payment on or about February 10, 2016.

13. On or about June 9, 2015, ANDREA MARIE PASLEY prepared and filed, and caused the preparation and filing of, a false personal Form 1040A for tax year 2014.

14. On or about February 17, 2016, ANDREA MARIE PASLEY prepared and filed, and caused the preparation and filing of, a false personal Form 1040 for tax year 2015.

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO THROUGH EIGHT
(Aiding and Assisting in the Preparation and Presentation of a False Tax
Return)

1. The general allegations in paragraphs 1–5 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about the dates set forth below, in the Middle District of North Carolina, and elsewhere, ANDREA MARIE PASLEY did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the IRS of U.S. Individual Income Tax Returns (IRS Forms 1040, 1040A) for the following tax years and taxpayers, as identified by their initials, which tax

returns were false and fraudulent as to material matters, including but not limited to those described below:

Count	Approximate Date Filed	Taxpayer	Form Type	Tax Year	False Material Matter(s)
2	Jan. 29, 2016	R.L.	1040A	2015	Wages (line 7) American Opportunity Credit (line 44)
3	Jan. 20, 2015	G.T.	1040A	2014	Education Credits (line 33) American Opportunity Credit (line 44)
4	Feb. 2, 2016	G.T.	1040A	2015	Education Credits (line 33) American Opportunity Credit (line 44)
5	March 28, 2015	J. I.	1040A	2014	Education Credits (line 33) American Opportunity Credit (line 44)
6	March 8, 2016	J. I.	1040	2015	Education Credits (line 50) American Opportunity Credit (line 68)
7	Feb. 13, 2015	Y.W.	1040A	2014	Federal Withholdings (line 40) American Opportunity Credit (line 44)
8	Feb. 5, 2016	Y.W.	1040A	2015	Wages (line 7)

					American Opportunity Credit (line 44)
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All in violation of Title 26, United States Code, Section 7206(2).

COUNT NINE

(Making and Subscribing a False Tax Return)

1. The general allegations in paragraphs 1-5 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about February 17, 2016, ANDREA MARIE PASLEY willfully made and subscribed and filed a false Form 1040 for calendar year 2015, which was verified by a written declaration that it was made under the penalties of perjury and which ANDREA MARIE PASLEY did not believe to be true and correct as to every material matter. On that tax return, ANDREA MARIE PASLEY reported that an individual whose initials are N.J. was her dependent, whereas ANDREA MARIE PASLEY knew that the information was false, and N.J. was not her dependent.

In violation of Title 26, United States Code, Section 7206(1).

COUNT TEN

(Aggravated Identity Theft)

1. On or about February 17, 2016, in the County of Durham, in the Middle District of North Carolina, ANDREA MARIE PASLEY, during and in relation to a felony enumerated in Title 18, United States Code, Section

1028A(c), to wit: wire fraud, in violation of Title 18, United States Code, Section 1343, knowingly possessed and used, without lawful authority, a means of identification of another person, that is the name and Social Security number of an individual whose initials are N.J.

In violation of Title 18, United States Code, Section 1028A(a)(1).

DATED: January 25, 2021

MATTHEW G. T. MARTIN
United States Attorney



BY: TODD ELLINWOOD
Assistant Chief, Tax Division



BY: KAVITHA BONDADA
Trial Attorney, Tax Division

A TRUE BILL

FOREPERSON